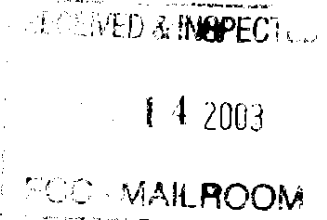


Comments on Docket #3-144



447 Knolls Vista Drive
Moses Lake, WA 98837
July 3, 2003 JUL 16 2003

Re. Docket 03-104

Distribution Center

Dear Sir

The first and foremost purpose of the Amateur Service as stated in 97.1 part a says "Recognition and enhancement of the value of the amateur service to the public as a voluntary non-commercial communication service, particularly with respect to providing emergency communications". After having read about the proposed BPL communications proposal I cannot see how the amateur service would be able to continue to fulfill the above Basis and Purpose.

My main interest in amateur radio has been in handling messages (we call it "traffic") on the 80, 75, 40 and 20 meter HF amateur bands. I use both SSB and CW to handle traffic and am active in several traffic nets, which include the Washington State CW Net, Seventh Region Net (CW), Pacific Area Net (CW), Washington Amateur Radio Traffic System (SSB) and Daytime Seventh Region Net (SSB). These HF nets are part a nationally coordinated organization of traffic nets called the National Traffic System (NTS) of which I've been involved for 44 years. Plus I have weekly out-of-net transcontinental traffic skeds with N1OTC in Mass. and KA2GJV in NY to pass traffic between the East and West coast areas.

I am very familiar with signal propagation and what it takes to get a message through. One of the requirements is having a reasonably low noise level. This is because most of the people with whom I handle traffic are running power at the 100 watt level. I have copied traffic from stations with signals as weak as S-2 (12 db above the noise floor). For example, just yesterday I sent some traffic to Bruce, KA2GJV, with our signals in the S-3 to S-4 range. As I was sending these messages to Bruce I was thinking that getting these messages through would be impossible with BPL communications in operation. When it comes to emergency communications, having a low noise floor is essential because most signals will be below S-8 (48 db above noise floor).

I am not involved in the Salvation Army SATERN (Salvation Army Team Emergency Radio Network) Net but I did listen to their net on 20 meter SSB after the 9/11 attack. I was absolutely amazed by these amateur operators who ran the SATERN net round-the-clock for many days, mainly for coordinating getting blood to the disaster area. The only role I played was standing by to relay a message when needed (I relayed one message). The signals I heard on SATERN were not too strong so if the BPL comm system were in effect, the SATERN Net would have been unable to perform its role in this national emergency, with the result of having a more lives put at risk.

Neither am I involved in the MARS program but I can well imagine that the MARS people have a dim view of BPL communications, especially when it comes to providing communications for military personnel. What listening I've done on MARS frequencies

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indicates that signals aren't especially strong. BPL comm would make communications by MARS people worse than marginal.

About a year ago the American Radio Relay League (ARRL) received a federal grant to train Amateur Radio Operators in the area of emergency communications (emcomm). I decided to learn more about emcomm and over the last 8 months have completed the Level 1 and 2 courses. I hope to implement a lot of what I learned in the area of emcomm and give the taxpayers their money's worth. Unfortunately, were BPL comm to be implemented, all of my emcomm efforts will be for naught. I see myself as being put off the air by the interference and unable to do any emergency communications on HF whatsoever. Yet, and I'll state this again, the first and foremost Basis and Purpose of the Amateur Service is in the area of emergency communications. If BPL is implemented, I see the Amateur Service as being forced into non-compliance with its primary Basis and Purpose as stated in 97.1 part a.

On June 21, ARRL became an official affiliate program of Citizen Corps, an initiative within the Department of Homeland Security Department to enhance public preparedness and safety. Among other things, the affiliation statement calls on DHS and ARRL to raise public awareness of Amateur Radio as a safety resource. In addition, DHS and ARRL will cooperate in providing training and accreditation for Amateur Radio emergency communications and promote the formation of local Citizen Corps councils. Although I haven't read the details, I'm sure that it deals with not only with emergency communications but National Security as well. If this is the case, then because people who can provide emergency communications are caused to become impotent due to high BPL noise, one cannot help but come to the conclusion that BPL is a threat to this agreement with the Homeland Security Department and perhaps to national security. The cooperative agreement between the amateur radio community and the Homeland Security Department won't be worth the paper it's written on.

Although there have relatively few respondents to Docket 03-104 (1000 so far), I consider that I'm making these on behalf of several hundred amateurs, who, for one reason or another, aren't responding. I tried to e-mail my comments but found I couldn't get my computer to do ASCII. I hope that your final decision concerning BPL communications will take into consideration the negative effect that BPL communications will have on the ability of the Amateur Service to provide emergency communications, thereby undermining the Basis & Purpose of the Amateur Service as stated in 97.1 of the FCC regulations which govern the Amateur Radio Service.

Yours truly,
Don Calbick W7GB
e-mail: w7gb@arrl.net

